

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION**

Alacia C. Quinton as PR for the Estate of April Lynn Quinton,)	C/A No. <u>1:10-2187-JMC</u>
)	
)	
Plaintiff,)	PLAINTIFF’S SUPPLEMENTAL
)	RULE 26(a)(3) DISCLOSURES
v.)	
)	
Toyota Motor Corporation, et al.,)	
)	
Defendants.)	

Pursuant to Federal Rules of Civil Procedure 26(a)(3), Plaintiff hereby submits the following supplemental pretrial disclosures:

II. Plaintiff will publish the following deposition excerpts from the witnesses listed below:

1. Dr. Raymond Bynoe: Taken 01/23/13

Page 4 Line 2 through Page 10 Line 24.
Page 11 Line 20 through Page 14 Line 19.

Plaintiff intends to call the following witnesses live at trial. However, in the event that they were to become unavailable to appear live at trial, Plaintiff would read the following listed testimony.

1. Ronnie Cullum: Taken 02/14/12

Page 3 Line 20 through Page 4 Line 9.
Page 5 Line 12 through Page 5 Line 21.
Page 6 Line 21 through Page 7 Line 5.
Page 8 Line 5 beginning with “What do” through Page 8 Line 17.
Page 9 Line 12 beginning with “do you know” through Page 9 Line 25.
Page 10 Line 8 through Page 10 Line 14.
Page 10 Line 18 through Page 11 Line 21.

Page 13 Line 11 through Page 13 Line 20.
Page 14 Line 15 through Page 14 Line 18.
Page 15 Line 5 through Page 15 Line 13 end after “Yeah”.
Page 15 Line 22 beginning with “So she passes” through Page 16 Line 13.
Page 17 Line 1 through Page 19 Line 6.
Page 19 Line 21 through Page 20 Line 2.
Page 20 Line 8 through Page 24 Line 5.
Page 24 Line 12 through Page 24 Line 22.
Page 25 Line 8 through Page 26 Line 8.
Page 29 Line 24 through Page 32 Line 17.
Page 35 Line 25 through Page 36 Line 22.
Page 39 Line 6 through Page 40 Line 6.

2. (Vicki) Kathleen Calais: Taken May 8, 2012

Page 6 Line 9 beginning with “Did you know” through Page 6 Line 15.
Page 8 Line 9 through Page 8 Line 22.
Page 9 Line 5 beginning with “Were you employed” through Page 9 Line

13.

Page 11 Line 17 through Page 11 Line 22.
Page 13 Line 3 through Page 13 Line 5.
Page 14 Line 25 beginning with “So we have” through Page 15 Line 17.
Page 16 Line 5 beginning with “So the vehicle” through Page 16 Line 7.
Page 16 Line 14 through Page 17 Line 3.
Page 17 Line 14 through Page 19 Line 8.
Page 19 Line 14 through Page 20 Line 22.
Page 33 Line 7 through Page 34 Line 3.
Page 35 Line 7 through Page 35 Line 19.
Page 37 Line 10 through Page 37 Line 18.

Respectfully Submitted,

THE CLARDY LAW FIRM

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing document was filed electronically with the Clerk of the Court for the U.S. District Court, District of South Carolina, using the electronic case filing system of the court. The electronic case filing system sent "Notice of Electronic Filing" to all attorneys of record listed below on this 7th day of May, 2013.

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s/B. Allen Clardy